Fact Sheet MA0040355

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY NEW ENGLAND - REGION I 5 POST OFFICE SQUARE, SUITE 100 BOSTON, MASSACHUSETTS 02109-3912

# **FACT SHEET**

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT TO DISCHARGE TO WATERS OF THE UNITED STATES PURSUANT TO THE CLEAN WATER ACT (CWA)

NPDES PERMIT NUMBER: MA0040355

NAME AND MAILING ADDRESS OF APPLICANT:

IPG Photonics Corporation 50 Old Webster Road Oxford, MA 01540

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

IPG Photonics Corporation 50 Old Webster Road Oxford, MA 01540

**RECEIVING WATER(S): French River** 

(USGS Hydrologic Code #01100001 – Quinebaug River Basin)

**RECEIVING WATER CLASSIFICATION(S): Class B** - Warm water fishery

**SIC CODE: 3674** – Semiconductors and Related Devices

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Figure 1 – Topographic Map

Figure 2 – Reverse Osmosis Water – Schematic Diagram

# I. Proposed Action, Type of Facility and Discharge Location

IPG Photonics Corporation, or "IPG" (the permittee), operates a facility in Oxford, Massachusetts that is engaged in the manufacture of lasers and laser amplifiers for commercial and industrial use. The facility was authorized to discharge reverse osmosis (RO) reject water on March 31, 2005 to the French River through Outfall 001, in accordance with the general permit for RO reject water (ROGP) that was issued on December 17, 2002. The permittee initiated this discharge in June of 2006 and had previously discharged this water to an on-site storage tank along with 2 other waste streams and had this water taken off site for disposal.

The ROGP expired on December 17, 2007 and EPA has decided not to reissue it. Therefore, this RO reject water discharge will be authorized under this individual permit. As such, the previous NPDES ROGP# of MAG450004 has been changed to the individual NPDES permit #MA0040355. The permittee filed an individual permit application on June 10, 2009 and this was determined to be complete on June 29, 2009.

The reissued permit will authorize the discharge of RO reject water from Outfall 001 at up to a daily maximum flow of 6,000 gallons per day (GPD) to the French River. The effluent is discharged to a 4 inch PVC pipe in the building and routed underneath the road adjacent to the main building. This pipe then emerges through a headwall and near the shore of the French River where it is discharged through Outfall 001. See **Figure 1** for a map of the facility and **Figure 2** for a schematic drawing of the RO process.

# II. Description of Treatment System and Discharges

#### Outfall 001 – Reverse Osmosis Reject Water

To achieve the required level of water purity for its manufacturing and research and development (R&D) processes, IPG employs a reverse osmosis (RO) system to treat the incoming water, which is supplied by the Town of Oxford through its contract operator, Aquarion Water Company. The outputs of this RO system are a purified water which is used in production and the RO reject water, which is discharged to Outfall 001. This reject water contains the typical parameters which are found in drinking water, except at higher concentrations.

The Town of Oxford's source water contains some residual chlorine and other chlorination byproducts. Since chlorine is detrimental to the operation of RO units, this source water is first passed through an activated carbon filtration system followed by a water softener prior to entering the RO unit. After the RO unit, the reject water is routed to Outfall 001 to the French River. The purified water that is used in manufacturing is passed through an ultraviolet (UV) light for bacteria control followed by additional filters to remove most of the remaining solids. Roughly once per year, the permittee disconnects the RO system from the discharge line and conducts an acid wash and sterilization of the system piping. This acid wash water is collected in the facility's acid wash tank and is not discharged to Outfall 001. The other filters and the UV lights are replaced as

necessary and not backwashed. The ROGP required that IPG collect effluent samples immediately after the RO system is back on line after such a cleaning and the individual permit has retained this requirement. Flow is monitored continuously by meter at the RO unit. Dissolved oxygen (DO) and pH are sampled and analyzed weekly on-site and analysis for other parameters is contracted through an off-site laboratory.

## **III. Receiving Water Description**

Under the state water use classification system, MassDEP has designated this stretch of the French River (Segment MA42-04), as a Class B warm water fishery (314 CMR 4.00). Class B waters are designated as a habitat for fish, other aquatic life, and wildlife and for primary and secondary contact recreation. These waters are to be suitable for public water supply following appropriate treatment, irrigation and other agricultural uses, and compatible industrial cooling and process uses. The waters shall have consistently good aesthetic value.

## IV. Limitations and Conditions

The effluent limitations and all other requirements described in Part VI of this Fact Sheet may be found in the draft permit.

# V. Permit Basis: Statutory and Regulatory Authority

# **General Requirements**

The Clean Water Act (CWA) prohibits the discharge of pollutants to waters of the United States without a National Pollutant Discharge Elimination System (NPDES) permit unless such a discharge is otherwise authorized by the CWA. The NPDES permit is the mechanism used to implement technology and water quality-based effluent limitations and other requirements including monitoring and reporting. This draft NPDES permit was developed in accordance with various statutory and regulatory requirements established pursuant to the CWA and any applicable State regulations. The regulations governing the EPA NPDES permit program are generally found at 40 CFR Parts 122, 124, 125, and 136.

When developing permit limits, EPA must consider the most recent technology-based treatment and water quality-based requirements. Subpart A of 40 CFR Part 125 establishes criteria and standards for the imposition of technology-based treatment requirements in permits under Section 301(b) of the CWA, including the application of EPA-promulgated effluent limitations and case-by-case determinations of effluent limitations under Section 402(a)(1) of the CWA. EPA is required to consider technology and water quality-based requirements as well as all limitations and requirements in the existing permit when developing permit limits.

# **Technology-Based Requirements**

Technology-based treatment requirements represent the minimum level of control that must be imposed under Sections 301(b) and 402 of the CWA (see 40 CFR §125 Subpart A) to meet best practicable control technology currently available (BPT) for conventional pollutants and some metals, best conventional control technology (BCT) for conventional pollutants, and best available technology economically achievable (BAT) for toxic and non-conventional pollutants. There are no effluent limitations guidelines which are applicable to this facility.

In general, the statutory deadline for non-POTW, technology-based effluent limitations must be complied with as expeditiously as practicable but in no case later than three years after the date such limitations are established and in no case later than March 31, 1989 (see 40 CFR §125.3(a)(2)). Compliance schedules and deadlines not in accordance with the statutory provisions of the CWA can not be authorized by a NPDES permit.

In the absence of published technology-based effluent guidelines, the permit writer is authorized under Section 402(a)(1)(B) of the CWA to establish effluent limitations on a case-by-case basis using best professional judgment (BPJ).

The effluent monitoring requirements have been established to yield data representative of the discharges under the authority of Section 308(a) of the Clean Water Act, according to regulations set forth at 40 CFR § 122.41(j), 122.44(i) and 122.48. The monitoring program in the permit specifies routine sampling and analysis which will provide continuous information on the reliability and effectiveness of the installed pollution abatement equipment. The approved analytical procedures are to be found in 40 CFR 136 unless other procedures are explicitly required in the permit.

# **Water Quality-Based Requirements**

Water quality-based limitations are required in NPDES permits when EPA and the State determine that effluent limits more stringent than technology-based limits are necessary to maintain or achieve state or federal water quality standards (WQS). See Section 301(b)(1)(C) of the CWA.

Receiving water requirements are established according to numerical and narrative standards adopted under state law for each water quality classification. When using chemical-specific numeric criteria to develop permit limits, both the acute and chronic aquatic-life criteria, expressed in terms of maximum allowable in-stream pollutant concentration, are used. Acute aquatic-life criteria are considered applicable to daily time periods (maximum daily limit) and chronic aquatic-life criteria are considered applicable to monthly time periods (average monthly limit). Chemical-specific limits are allowed under 40 CFR § 122.44(d)(1) and are implemented under 40 CFR § 122.45(d). The Region has established, pursuant to 40 CFR 122.45(d)(2), a maximum daily limit and average monthly discharge limits for specific chemical pollutants.

A facility's design flow is used when deriving constituent limits for daily and monthly time periods as well as weekly periods where appropriate. Also, the dilution provided by the receiving water is factored into this process where appropriate. Narrative criteria from the state's WQS are often used to limit toxicity in discharges where (a) a specific pollutant can be identified as causing or contributing to the toxicity but the state has no numeric standard; or (b) toxicity cannot be traced to a specific pollutant.

EPA regulations require NPDES permits to contain effluent limits more stringent than technology-based limits where more stringent limits are necessary to maintain or achieve state or federal WQS. The permit must address any pollutant or pollutant parameter (conventional, non-conventional, toxic and whole effluent toxicity) that is or may be discharged at a level that causes or has "reasonable potential" to cause or contribute to an excursion above any water quality criterion. See 40 CFR Section 122.44(d)(1). An excursion occurs if the projected or actual in-stream concentration exceeds the applicable criterion. In determining reasonable potential, EPA considers (a) existing controls on point and non-point sources of pollution; (b) pollutant concentration and variability in the effluent and receiving water as determined from the permit application, Monthly Discharge Monitoring Reports (DMRs), and State and Federal Water Quality Reports; (c) sensitivity of the species to toxicity testing; (d) known water quality impacts of processes on wastewater; and, where appropriate, (e) dilution of the effluent in the receiving water.

WQS consist of three parts: (a) beneficial designated uses for a water body or a segment of a water body; (b) numeric and/or narrative water quality criteria sufficient to protect the assigned designated use(s); and (c) antidegradation requirements to ensure that once a use is attained it will not be degraded. The Massachusetts Surface Water Quality Standards (MA SWQS), found at 314 CMR 4.00, include these elements. The state will limit or prohibit discharges of pollutants to surface waters to assure that surface water quality standards of the receiving waters are protected and maintained or attained. These standards also include requirements for the regulation and control of toxic constituents and require that EPA criteria, established pursuant to Section 304(a) of the CWA, shall be used unless a site-specific criterion is established. The conditions of the permit reflect the goal of the CWA and EPA to achieve and then to maintain WQS.

## **Antibacksliding**

A permit may not be renewed, reissued or modified with less stringent limitations or conditions than those contained in the previous permit unless in compliance with the antibacksliding requirements of the CWA [see Sections 402(o) and 303(d)(4) of the CWA and 40 CFR §122.44(l)(1 and 2)]. EPA's antibacksliding provisions prohibit the relaxation of permit limits, standards, and conditions except under certain circumstances. Effluent limits based on BPJ, water quality, and state certification requirements must also meet the antibacksliding provisions found at Section 402(o) and 303(d)(4) of the CWA. Since all proposed permit conditions are at least as stringent as those of the current permit, antibacksliding is not applicable for this permit reissuance.

# **Antidegradation**

Federal regulations found at 40 CFR Section 131.12 require states to develop and adopt a statewide antidegradation policy which maintains and protects existing instream water uses and the level of water quality necessary to protect the existing uses, and maintains the quality of waters which exceed levels necessary to support propagation of fish, shellfish, and wildlife and to support recreation in and on the water. The Massachusetts Antidegradation Regulations are found at Title 314 CMR 4.04. This draft permit is being reissued with similar limits that were established in the ROGP. Therefore, EPA and MassDEP have determined that there is no evaluation that needs to be conducted relative to antidegradation since the permittee is not increasing its permitted flow or adding any new or increased levels of any pollutants.

#### **State Certification**

Under Section 401 of the CWA, EPA is required to obtain certification from the state in which the discharge is located that all water quality standards or other applicable requirements of state law, in accordance with Section 301(b)(1)(C) of the CWA, are satisfied. EPA permits are to include any conditions required in the state's certification as being necessary to ensure compliance with state water quality standards or other applicable requirements of state law. (See CWA Section 401(a) and 40 CFR §124.53(e).) Regulations governing state certification are set out at 40 CFR §124.53 and §124.55. EPA regulations pertaining to permit limits based upon water quality standards and state requirements are contained in 40 CFR §122.44(d).

# VI. Explanation of Permit's Effluent Limitations

#### Outfall 001

The ROGP had 2 sets of limits, one that applied to discharges with a dilution factor of 10 to 99 and another for discharges with a dilution factor of 100 to 1000. The estimated dilution factor available to the daily maximum flow of 6000 gallons per day (GPD) is 273. This was based on an estimated 7Q10 flow of 2.53 cubic feet per second (cfs) in this stretch of the French River, as provided by the permittee. The 7Q10 flow is the 7 day mean low flow, measured in cubic feet per second (cfs), at a 10 year recurrence interval and is typically used in permits to establish certain permit limits. Therefore, the ROGP for this permittee was based on the 100 to 1000 dilution range, which included limits for Total Suspended Solids (TSS), Total Residual Chlorine (TRC), pH, Total Copper and Dissolved Oxygen. There were also monitoring requirements for flow and ammonia. Since there are no technology based effluent guidelines for RO reject water discharges, the effluent limits and other conditions in this permit have been established using BPJ as authorized by Section 402(a)(1)(B) of the CWA. Therefore, for this individual draft permit, EPA has evaluated whether these previous limits and monitoring requirements are still appropriate based on past discharge monitoring results and also considered whether

any other requirements need to be included, based on the recently submitted individual permit application.

#### **Flow**

The ROGP had required flow monitoring with no limit for IPG. The permittee has noted that the RO system can discharge RO reject water at a rate of up to 6,000 GPD. Therefore, this will be set as the daily maximum permitted flow limit. Recent DMRs have shown flow levels ranging from 500 to 2000 GPD.

# Copper

Copper may be toxic to aquatic life at low concentrations, so the ROGP contained numerical limits for total recoverable copper and specified an appropriate method of analysis. Total copper limits in the ROGP were established at a monthly average of 516 ug/l and a daily maximum of 730 ug/l for those discharges in the 100 – 1000 dilution range. The permittee has reported total copper values of between non-detect and 31 ug/l since obtaining coverage under the ROGP. The copper limits that would apply for this discharge are hardness dependent and have been calculated below to reflect the water quality criteria published in the Federal Register on December 10, 1998 (National Recommended Water Quality Criteria, December 10, 1998, FR Vol. 63, No.237) and dilution factors based on revised plant flows.

Water Quality-Based Total Copper limits that would apply to this discharge

$$e(X[ln(h)] + Y)$$

Where X is the chronic coefficient for dissolved fractions of a particular metal; Y is the acute coefficient for dissolved fractions of a particular metal; and h is the hardness of the receiving water; In is the natural logarithm

Calculation of the applicable water quality based copper limits for this discharge:

Chronic: 
$$X = 0.8545$$
  $Y = -1.702$  Acute  $X = 0.9422$   $Y = -1.70$ 

Estimated hardness = 25 mg/l as CaCO3

(Estimate based on hardness data from whole effluent toxicity testing reports of Oxford-Rochdale POTW's NPDES permit, MA0100170)

Thus; 
$$e(.8545 \text{ [(ln25)] -1.702)} \qquad e(.9422 \text{ [(ln25)] -1.70)} = \\ 2.8 \text{ ug/l} \qquad \qquad 3.8 \text{ ug/l}$$

To achieve the applicable effluent limits, the following dilution factors were used:

French River 7Q10 flow near facility (from USGS Streamstats): 2.53 cfs = 1.63 MGD

Average Flow = 2,500 GPD or 0.0025 MGD; Maximum Flow = 0.006 MGD

Avg. flow dilution:  $\frac{1.63 + 0.0025}{0.0025} = 653$  max. flow dilution:  $\frac{1.63 + 0.006}{0.006} = 273$ 

Monthly Average (chronic) Daily Maximum (acute) 653 (2.8) = 1830 mg/l = 1.83 mg/l 273 (3.8) = 1040 ug/l = 1.04 mg/l

These values must be divided by a conversion factor to attain the applicable total recoverable metal limits. The chronic value corresponds to a monthly average limit and the acute to a daily maximum limit.

Monthly average: 1.83 mg/l / 0.96 = 1.9 mg/lDaily Maximum: 1.04 mg/l / 0.96 = 1.1 mg/l

Since the ROGP copper limits are more stringent than those based on the actual dilution, the ROGP's total recoverable copper limits of 516 and 730 ug/l would apply for this discharge. The DMRs have shown effluent total copper levels in the range of non-detect to 31 ug/l. Therefore, due to the relatively low levels of copper in the effluent, the monitoring frequency has changed from monthly to quarterly to verify that the effluent levels remain well below these values. In addition, the sample type has been changed from a 24 hour composite to a grab sample, because there is not expected to be significant variability in the discharge of effluent copper over a 24 hour period.

# pН

The pH range in the ROGP was limited to the Class B range of 6.5 to 8.3 s. u. which is the range required by state WQS and which can be found at 314 CMR 4.05. The permittee has been in compliance with this pH range and this range will remain in this permit. The DMRs have reported effluent pH in the range of 6.8 to 8.2 s.u. since September of 2006. The draft permit continues to require weekly grab samples for pH and a reporting of the monthly pH range in the DMRs.

#### **Total Suspended Solids (TSS)**

Since RO systems concentrate solids in the intake water, the previous ROGP had established permit limits of 30 mg/l (monthly average) and 45 mg/l (daily maximum) for TSS as well as a monitoring requirement for the mass of TSS discharged. Since September of 2006, the permittee has not detected TSS in its effluent. In order to assure that the carbon filtration system that the source water is passed through prior to the RO unit is working properly and that suspended solids do not pass through to the effluent, the limits and monthly monitoring requirement have been retained in the draft permit. The sample type has been changed from a 24 hour composite to a grab sample, because there

is not expected to be significant variability in the discharge of TSS through a 24 hour period. In addition, the permittee is no longer required to report the mass of TSS associated with the detected concentration, as the mass loading of TSS is very small relative to the amount in the receiving water.

# Dissolved Oxygen (DO)

With the ROGP, there was a minimum dissolved oxygen (DO) level of 6.0 mg/l required, to be monitored once per week. This limit also complies with the State WQS minimum of 5.0 mg/l for warm water fisheries. DMR data since September of 2006 have shown the DO to be within the range of 6.8 to 11.9 mg/l. Therefore, this parameter will continue to be monitored with the 6.0 mg/l minimum requirement, but the monitoring frequency has been changed from weekly to monthly to reflect the compliance with this limit since the permittee has been discharging.

## **Total Residual Chlorine (TRC)**

The ROGP established a limit for Total Residual Chlorine (TRC). The permittee will not be using any chlorine based chemical for cleaning purposes and all discharges associated with the cleaning of the RO units will be discharged to the onsite holding tanks and disposed of separately. However, the Town of Oxford's water supply, the source of the water used at this facility, is chlorinated and TRC has been detected in the effluent in the range of 0.005 to 0.09 mg/l, with no violations of the limit of 1.0 mg/l. This was the limit determined in the ROGP for discharges which had a dilution factor of greater than 100. The following calculation shows what the TRC limit would be based on the actual dilution:

Water Quality Criteria: Freshwater – Chronic: 0.011 mg/l; Acute: 0.019 mg/l

Effluent Limitations: Monthly Average: 653 (0.011 mg/l) = **7.2 mg/l** 

Daily Maximum: 273 (0.019 mg/l) = 5.2 mg/l

Since the ROGP's TRC limits are more stringent than those based on the actual dilution, the ROGP's limits of 1.0 mg/l as a monthly average and a daily maximum will remain in this permit due to anti-backsliding and since the permittee has demonstrated that it can comply with these limits. The monitoring frequency has been changed from weekly to monthly to assure that the carbon filtration system is working as intended and removing most of the residual chlorine in the source water prior to being sent through the RO unit and eventually discharged to Outfall 001.

#### **Total Ammonia Nitrogen (TAN)**

When RO units are bleached or cleaned with hypochlorite or other chlorine based compounds, chloromines are created, resulting in the reject water containing ammonia. Therefore, TAN monitoring was required in the ROGP.

The permittee has its RO system lines disconnected from the outfall and cleaned on-site and the water through the system is tested for acid residue and residual sterilizer before it is connected back to the discharge line. In addition, sampling is required immediately after such a cleaning. Since September of 2006, DMRs have shown TAN levels detected at up to 350 ug/l, with the majority of samples resulting in no detection. However, since TAN has been detected occasionally at low levels, this monitoring requirement has been maintained in this draft permit, but the monitoring frequency has been changed from monthly to quarterly.

# VII. Essential Fish Habitat Determination (EFH)

Under the 1996 Amendments (PL 104-267) to the Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. § 1801 et seq. (1998)), EPA is required to consult with the National Marine Fisheries Service (NMFS) if EPA's actions or proposed actions that it funds, permits, or undertakes, may adversely impact any essential fish habitat, such as: waters and substrate necessary to fish for spawning, breeding, feeding or growth to maturity (16 U.S.C. § 1802(10)). "Adversely impact" means any impact which reduces the quality and/or quantity of EFH (50 C.F.R. § 600.910(a)). Adverse effects may include direct (e.g., contamination or physical disruption), indirect (e.g., loss of prey, reduction in species' fecundity), site-specific or habitat-wide impacts, including individual, cumulative, or synergistic consequences of actions.

Essential fish habitat is only designated for species for which federal fisheries management plans exist (16 U.S.C. §1855(b)(1)(A)). EFH designations for New England were approved by the U.S. Department of Commerce on March 3, 1999. The French River is not covered by the EFH designation for riverine systems and thus EPA has determined that EFH consultation with NMFS is not required.

# VIII. Endangered Species Act (ESA)

Section 7(a) of the Endangered Species Act of 1973, as amended (ESA) grants authority to and imposes requirements upon Federal agencies regarding endangered or threatened species of fish, wildlife, or plants ("listed species") and habitat of such species that has been designated as critical (a "critical habitat"). The ESA requires every Federal agency, in consultation with and with the assistance of the Secretary of Interior, to insure that any action it authorizes, funds, or carries out, in the United States or upon the high seas, is not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of critical habitat. The United States Fish and Wildlife Service (USFWS) typically administer Section 7 consultations for bird, terrestrial, and freshwater aquatic species. The NMFS typically administers Section 7 consultations for marine species and anadromous fish.

EPA has reviewed the federal endangered or threatened species of fish, wildlife, and plants to see if any such listed species might potentially be impacted by the reissuance of this NPDES permit and has not found any such listed species. EPA has determined that there are no species of concern present in the vicinity of the outfall from this Facility.

Therefore, EPA does not need to formally consult with NMFS or USFWS in regard to the provisions of the ESA.

EPA has structured the proposed limits to be sufficiently stringent to assure that Water Quality Standards will be met. The effluent limits established in this permit ensure the protection of aquatic life and maintenance of the receiving water as an aquatic habitat. During the public comment period, EPA has provided a copy of the Draft Permit and Fact Sheet to both NMFS and USFWS.

#### **Other Conditions**

The remaining conditions of the permit are based on the NPDES regulations, 40 CFR Parts 122 though 125, and consist primarily of management requirements common to all permits.

## IX. State Certification Requirements

EPA may not issue a permit unless the State Water Pollution Control Agency with jurisdiction over the receiving waters certifies that the effluent limitations contained in the permit are stringent enough to assure that the discharge will not cause the receiving water to violate State WQS. The staff of MassDEP has reviewed the draft permit and advised EPA that the limitations are adequate to protect water quality. EPA has requested permit certification by the State pursuant to 40 CFR 124.53 and expects that the draft permit will be certified.

# X. Public Comment Period, Public Hearing, and Procedures for Final Decision

All persons, including applicants, who believe any condition of the draft permit is inappropriate must raise all issues and submit all available arguments and all supporting material for their arguments in full by the close of the public comment period, to the U.S. EPA, Industrial Permits Branch, Mailcode OEP 06-1, 5 Post Office Square, Suite 100, Boston, Massachusetts 02109-3912. Any person, prior to such date, may submit a request in writing for a public hearing to consider the draft permit to EPA and MassDEP. Such requests shall state the nature of the issues proposed to be raised in the hearing. A public hearing may be held after at least thirty days public notice whenever the Regional Administrator finds that response to this notice indicates significant public interest. In reaching a final decision on the draft permit the Regional Administrator will respond to all significant comments and make these responses available to the public at EPA's Boston office.

Following the close of the comment period, and after a public hearing, if such hearing is held, the Regional Administrator will issue a final permit decision and forward a copy of the final decision to the applicant and each person who has submitted written comments or requested notice. Within 30 days following the notice of the final permit decision, any interested person may submit a request for a formal hearing to reconsider or contest the final decision. Requests for formal hearings must satisfy the requirements of 40 CFR 124.74, 48 Fed. Reg. 14279-14280 (April 1, 1983).

# **XI. EPA and MassDEP Contacts**

Additional information concerning the draft permit may be obtained between the hours of 9:00 a.m. and 5:00 p.m., Monday through Friday, excluding holidays, from the EPA and MassDEP contacts below:

George Papadopoulos, Industrial Permits Branch 5 Post Office Square - Suite 100 - Mailcode OEP 06-1 Boston, MA 02109-3912 Telephone: (617) 918-1579 FAX: (617) 918-1505

Kathleen Keohane, Massachusetts Department of Environmental Protection Division of Watershed Management, Surface Water Discharge Permit Program 627 Main Street, 2nd Floor, Worcester, Massachusetts 01608 Telephone: (508) 767-2856 FAX: (508) 791-4131

December 10, 2009
Date
Stephen S. Perkins, Director
Office of Ecosystem Protection
U.S. Environmental Protection Agency